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August 27, 2019

BY EMAIL

Honorable Bradley S. Schneider
Committee on Ways and Means
United States House of Representatives
1102 Longworth House Office Building
Washington, DC 20515

Dear Congressman Schneider:

On behalf of our client, Ackerman McQueen (AMc), we acknowledge receipt of your letter to AMc dated August 20, 2019 regarding potential wrongdoing by the National Rifle Association (NRA). Your letter requested that AMc make public specific documents that can assist you in your determination of any wrongdoing. We cannot do so. However, we can provide responsive documents to the House of Representatives.

As you can see, in the attached letter dated August 24, 2019, the NRA has already directed AMc to not produce any documents in response to your request without NRA's review and written consent. While NRA has failed to meet its contractual obligations under the same contract, AMc has continued to meet its obligation. AMc will carefully review your request and conduct a search for relevant documents to determine whether or not they fall under the Agreement with the NRA, allow the NRA's review, and respond to you regarding our expected delivery to you.

Sincerely,

Stephen M. Ryan
Counsel to Ackerman McQueen

NATIONAL RIFLE ASSOCIATION OF AMERICA
OFFICE OF THE GENERAL COUNSEL
11250 WAPLES MILL ROAD
FAIRFAX, VIRGINIA 22030



NRA

(703) 267-1250
(703) 267-3985 fax

August 24, 2019

VIA ELECTRONIC MAIL

Stephen M. Ryan
McDermott Will & Emery
500 North Capitol Street, NW
Washington, DC 20001

David Schertler
Schertler & Onorato, LLP
901 New York Avenue, N.W.
Suite 500 West
Washington, DC 20001

RE: Representative Schneider's August 20, 2019 Letter to Ackerman McQueen, Inc.

Dear Messrs. Ryan and Schertler,

On behalf of the National Rifle Association of America (the "NRA"), I write to ensure that, in the event Ackerman McQueen, Inc. ("Ackerman") chooses to produce any documents in response to the August 20, 2019 request from Representative Schneider (attached), it adhere to its contractual duties to not do so without the NRA's express written consent.

As I previously stated on multiple occasions, including in my letter dated July 30, 2019, in connection with Ackerman's proposed document production to the New York Attorney General, under Section IV of its Services Agreement with the NRA, without the NRA's consent, Ackerman cannot disclose to anyone any information it learned as a result of its provision of services to the NRA. The agreement states that Ackerman "shall not disclose, directly or indirectly, to any third party any . . . data, materials or information coming to the knowledge of [Ackerman], supplied to [Ackerman] by NRA, or otherwise made known to [Ackerman] as a result of [Ackerman]'s providing Services (hereinafter collectively, referred to as the ('Confidential Information'), without the prior express written permission of NRA." (emphases added).

Of course, the NRA will promptly review any proposed productions that Ackerman may wish to make.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Frazer', with a stylized flourish at the end.

John Frazer
Secretary and General Counsel

Enclosure